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Date: July 9, 2025

To:
UNITED STATES DISTRICT COURT
SOUTHERN DISTRICT OF NEW YORK

Case No. 1:25-cv-03496-JPC-SLC

Re: Statement of Grievance Against Attorney Marc-Joseph Gansah, Bar Reg. No. 5502588

1. Complainant Information

- Name: Wesam Abdelzaher
- Pro Se Plaintiff in Case No. 1:25-cv-03496-JPC-SLC, filed in UNITED STATES DISTRICT COURT SOUTHERN DISTRICT OF NEW YORK.
- Address, telephone, and email as above.
- I request confidentiality because I fear retaliation in the ongoing litigation.

2. Respondent Attorney Information

- Name: Marc-Joseph Gansah
- Law Firm: OGLETREE, DEAKINS, NASH, SMOAK & STEWART, P.C.
- Office Address:
599 Lexington Ave Fl 1700
New York
NY 10022-6019
- Bar Registration Number: 5502588

3. Jurisdiction

This grievance is filed under 22 NYCRR Part 1200 (New York Rules of Professional Conduct) and Judiciary Law § 90.

4. Statement of Facts (Chronological)

a. On April 28, 2025, I filed a pro se complaint in UNITED STATES DISTRICT COURT SOUTHERN DISTRICT OF NEW YORK, against MATT BRIDGE, GOOGLE INC.

b. On May 28, 2025, Respondent—in his capacity as counsel for Matt Bridge and Google—emailed me with a discovery demand (**Exhibit A**) that included the following abusive, intimidating or discriminatory language:

- “*Ms. Abdelzaher*” (assumption of gender, misogyny), “*preferably today or tomorrow.*” (attempt to influence and rush decision making), “*I will call you this afternoon.*” (Threatening language, can be perceived as intimidating or even as “*I will kill you this afternoon.*”).

c. On June 24, 2025, the attorney emailed (**Exhibit B**) me a 321 page authorities document (**Exhibit C**) cited in the Motion to Dismiss:

- Document length is overwhelming and oppressive with suspected intention to limit my ability to represent myself as Pro Se and make legal representation inaccessible and inaccurate.
- Document referenced Syrians - I am not Syrian nor am I male. I am of African descent, the attorney is intentionally discriminating against my African origins and sex by attempting to mis-portray my race and gender.

d. In the Reply Memorandum in support of the Motion to Dismiss filed on July 1st, 2025, the attorney utilized misogynistic, uncivil, defamatory language (**Exhibit D**). Instead of investigating the retaliation the initial complaint referenced, the attorneys repeatedly described me as:

- “unsuccessful job applicant”, “failure”, and “futile” - even stating “she cannot assert rights.” — I am a NYU alumni, an experienced engineer with over seven years in tech and finance, a certified Google Cloud Solution Architect, and a citizen of the United States who can assert their rights.
- The statements are defamatory, inaccurate, and oppressive of my free speech and right to represent myself as Pro Se. This undermines my credibility despite my credentials and successes.

e. Respondent’s conduct has delayed proceedings, intimidated me, and caused emotional distress.

- Attorney emailed me a Cease and Desist (**Exhibit E**) on July 3, 2025 for simply having a LinkedIn account and speaking about my harrowing and exploitative experience interviewing with Google. I am being silenced and retaliated against.

5. Rules Violated

Respondent’s conduct, engaged “in connection with a lawyer’s professional activities,” violates:

- Rule 8.4(g) – prohibiting harassment and discrimination based on race, gender, disability, etc., as shown by his remarks about my sex, gender expression, religious expression.
- Rule 3.5(d) – improper conduct before a tribunal, by using derogatory and defamatory language during a legal communication.
- Rule 1.1 & 1.3 – competence and diligence, by intentionally using abusive tactics to obstruct my pro se access.

6. Exhibits (Supporting Documents)

Exhibit A: Discovery email demand dated May 28, 2025 containing discriminatory and threatening language.

Exhibit B: Email from the attorney on June 24, 2025 containing a 321 page document attachment of the authorities cited in the Motion to Dismiss.

Exhibit C: Attached 321 page authorities cited in Motion to Dismiss.

Exhibit D: Reply Memorandum in support of Motion to Dismiss dated July 1, 2025.

Exhibit E: Cease and Desist received from attorney on July 3, 2025.

7. Relief Requested

I respectfully ask the Committee to:

1. Open a formal investigation into Respondent's conduct.
2. Impose appropriate discipline if the violations are substantiated.
3. Deter other attorneys from using discriminatory or abusive tactics against pro se litigants.

8. Declaration

I certify under penalty of perjury under the laws of New York that the foregoing is true and correct to the best of my knowledge.

Respectfully submitted,

Date: July 9, 2025

New York, New York

/s/ Wesam Abdelzaher

Wesam Abdelzaher, Pro Se

396 Shepherd Ave APT 5, Brooklyn NY 11208

347-500-7429

wesam.abdelzaher0@gmail.com

A handwritten signature in black ink, appearing to read 'Wesam A', is written over the typed name and contact information.